

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SHOLEM WEISNER and SHMUEL NEMANOV)

Plaintiff and Involuntary Plaintiff)

v.)

GOOGLE LLC)

Defendant)

Case No.: 20-cv-02862-AKH

("Weisner I")

Case No.: 23-cv-08186-AKH

("Weisner II")

So ordered
7.22.25
Chick

PLAINTIFF SHOLEM WEISNER'S UNOPPOSED MOTION FOR
THE COURT TO FORMALLY SEAL FILED DOCUMENTS

PLEASE TAKE NOTICE that Plaintiff, SHOLEM WEISNER ("Weisner"), by and through its undersigned counsel, respectfully moves, pursuant to the Court's Individual Rule 4.B, and SDNY Electronic Case Filing Rules & Instructions, Rule 21.7, for the Court to seal the following documents ("Requested Documents"):

- Dkt Nos. 213, 214, and 249 from Case Number 20-cv-02862
- Dkt. 100 of Case No. 23-cv-08186-AKH and Dkt. 285 of Case No. 20-cv-02862-AKH
- Dkt. 130 of Case No. 23-cv-08186-AKH and Dkt. 315 of Case No. 20-cv-02862-AKH

The ECF Help Desk has already put a temporary seal on all the Requested Documents, pursuant to ECF Filing Rule 21.7 and informed Chambers of their actions.

The Requested Documents were originally filed as redacted versions of documents that were authorized to be filed under seal by this Court (*See* ECF 221, 251, 297, 319). The parties have since discovered that an error took place in the redacting of these public documents and confidential information was inadvertently not protected by the attempted redactions. The

Requested Documents which are the subject of this motion contain Plaintiff Sholem Weisner's medical information and discussion of medical conditions, as well as confidential facts regarding Google's confidential business information, including technical details about its products and sensitive financial information about Google's business units and organization. Google contends that the disclosure of this information to a non-party would create a substantial risk of serious harm to Google, including by providing its competitors an unfair advantage or unfairly allowing its competitors to develop competing products. Substantial risks to Plaintiff and Google cannot be avoided by less restrictive means than by filing the above-identified Requested Documents under seal. Moreover, all the documents have been designated as CONFIDENTIAL and HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY under the Protective Order (Dkt. 155). Plaintiff has already re-filed redacted versions of Dkt. 100 of Case No. 23-cv-08186-AKH, Dkt. 285 of Case No. 20-cv-02862-AKH, Dkt. 130 of Case No. 23-cv-08186-AKH, and Dkt. 315 of Case No. 20-cv-02862-AKH on the docket. Plaintiff will re-file this week new and appropriately redacted versions of from Dkt. Nos. 213, 214, and 249 from Case Number 20-cv-02862.

Accordingly, Plaintiff respectfully requests that the Court grant this unopposed motion to for the Court to seal the following documents ("Requested Documents"):

- Dkt Nos. 213, 214, and 249 from Case Number 20-cv-02862
- Dkt. 100 of Case No. 23-cv-08186-AKH and Dkt. 285 of Case No. 20-cv-02862-AKH
- Dkt. 130 of Case No. 23-cv-08186-AKH and Dkt. 315 of Case No. 20-cv-02862-AKH

Dated: July 22, 2025

Respectfully Submitted:

/s/ Aaron W. Davis
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Attorneys for Plaintiff, Sholem Weisner

CERTIFICATE OF SERVICE:

This will certify that a true and accurate copy of the foregoing was filed and served electronically on all counsel of record via the Court's CM/ECF system, on this the 22nd day of July, 2025.

/s/ Aaron W. Davis
Attorney for Plaintiff, Sholem Weisner